

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

MAY 15 2013

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBIN CASH,

Defendant.

Cr. No. 12-1932 JH

UNITED STATES' PROFFER OF EVIDENCE AT TRIAL

The United States respectfully submits that, were this matter to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

1. Between September 2, 2008 and December 22, 2008, both dates being approximate and inclusive, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **ROBIN CASH**, while an agent of an organization that received at least \$10,000 in benefits under a federal program during calendar year 2008, to wit, Alternative House, Inc., knowingly and unlawfully embezzled, stole and converted to her own use property valued at \$5,000 or more that was owned by or under the care, custody or control of that organization.
2. Between January 5, 2009 and December 14, 2009, both dates being approximate and inclusive, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **ROBIN CASH**, while an agent of an organization that received at least \$10,000 in benefits under a federal program during calendar year 2009, to wit, Alternative House, Inc. knowingly

and unlawfully embezzled, stole and converted to her own use property valued at \$5,000 or more that was owned by or under the care, custody or control of that organization.

3. Between January 4, 2010 and December 31, 2010, both dates being approximate and inclusive, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **ROBIN CASH**, while an agent of an organization that received at least \$10,000 in benefits under a federal program during calendar year 2010, to wit, Alternative House, Inc. knowingly and unlawfully embezzled, stole and converted to her own use property valued at \$5,000 or more that was owned by or under the care, custody or control of that organization.

4. Between January 3, 2011 and February 17, 2011, both dates being approximate and inclusive, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **ROBIN CASH**, while an agent of an organization that received at least \$10,000 in benefits under a federal program during calendar year 2011, to wit, Alternative House, Inc. knowingly and unlawfully embezzled, stole and converted to her own use property valued at \$5,000 or more that was owned by or under the care, custody or control of that organization.

5. During the calendar year 2008, the defendant, **ROBIN CASH**, who was a resident of Albuquerque, New Mexico, had and received gross income totaling approximately \$46,104.00. By reason of that gross income, she was required by law, following the close of the calendar year 2008 and on or before April 15, 2009, to make an income tax return to the Internal Revenue Service Center, at Austin, Texas, to a person assigned to receive returns at the local office of the Internal Revenue Service at Albuquerque, New Mexico, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of her gross income and any deductions and credits to which she was entitled. Well

knowing and believing all the foregoing, she did willfully fail, on or about April 15, 2009, in the District of New Mexico and elsewhere, to file an income tax return.

6. During the calendar year 2009, the defendant, **ROBIN CASH**, who was a resident of Albuquerque, New Mexico, had and received gross income totaling approximately \$113,248.51. By reason of that gross income, she was required by law, following the close of the calendar year 2009 and on or before April 15, 2010, to make an income tax return to the Internal Revenue Service Center, at Austin, Texas, to a person assigned to receive returns at the local office of the Internal Revenue Service at Albuquerque, New Mexico, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of her gross income and any deductions and credits to which she was entitled. Well knowing and believing all the foregoing, she did willfully fail, on or about April 15, 2010, in the District of New Mexico and elsewhere, to file an income tax return.

7. During the calendar year 2010, the defendant, **ROBIN CASH**, who was a resident of Albuquerque, New Mexico, had and received gross income totaling approximately \$173,526.71. By reason of that gross income, she was required by law, following the close of the calendar year 2010 and on or before April 18, 2011, to make an income tax return to the Internal Revenue Service Center, at Austin, Texas, to a person assigned to receive returns at the local office of the Internal Revenue Service at Albuquerque, New Mexico, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of her gross income and any deductions and credits to which she was entitled. Well knowing and believing all the foregoing, she did willfully fail, on or about April 18, 2011, in the District of New Mexico and elsewhere, to file an income tax return.

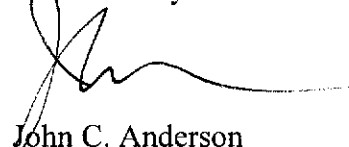
Respectfully submitted,

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I certify that I served a copy of the
foregoing pleading upon Counsel for
Defendant by hand.



John C. Anderson
Assistant U.S. Attorney